

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors. ¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION TO INFORM AMERINATIONAL COMMUNITY SERVICES, LLC'S
APPEARANCE AT THE OCTOBER 6-7, 2021 OMNIBUS HEARING**

COMES NOW AmeriNational Community Services, LLC (hereafter "AmeriNat") as servicer for the GDB Debt Recovery Authority (the "DRA") authorized to pursue and enforce the DRA's rights and remedies in any legal proceeding, including the DRA's participation as a creditor in the instant Title III case, by and through the undersigned legal counsel, and respectfully submits this motion in compliance with the Court's *Order Regarding Procedures for October 6-7, 2021 Omnibus Hearing* (Dkt. No. 18269) (the "Scheduling Order"):

1. Attorney Arturo J. García-Solá and/or Nayuan Zouairabani of McConnell Valdés, LLC will appear on behalf of AmeriNat at the October 6-5, 2021 Omnibus Hearing (the "Omnibus

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Building Authority ("PBA") (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Hearing”), which will be conducted virtually via videoconferencing (Zoom) and telephonic platforms.

2. The email address of Mr. García-Solá is ajg@mcvpr.com and the email address of Mr. Zouairabani is nzt@mcvpr.com. Further, Mr. García-Solá and Mr. Zouairabani hereby submit their Party Appearance Cover Sheet as **Exhibit A** to this motion.

3. Mr. García-Solá and/or Mr. Zouairabani may present oral argument related to the following pleadings:

- a. *Debtors’ Motion in Limine in Respect of Evidence Concerning Whether the Proposed Plan of Adjustment Is Consistent with the Certified Fiscal Plan* (Dkt. No. 18116);
- b. *Response and Objection to Debtors’ Motion in Limine in Respect of Evidence Concerning Whether the Proposed Plan of Adjustment Is Consistent with the Certified Fiscal Plan* (Dkt. No. 18181);
- c. *Puerto Rico Fiscal Agency and Financial Advisory Authority’s Reservation of Rights Regarding Debtors’ Motion in Limine in Respect of Evidence Concerning Whether the Proposed Plan of Adjustment Is Consistent with the Certified Fiscal Plan* (Dkt. No. 18187);
- d. *The DRA Parties’ Opposition Debtors’ Motion in Limine in Respect of Evidence Concerning Whether the Proposed Plan of Adjustment Is Consistent with the Certified Fiscal Plan* (Dkt. No. 18188);
- e. *Debtors’ Omnibus Reply in Support of Motion in Limine in Respect of Evidence Concerning Whether the Proposed Plan of Adjustment Is Consistent with the Certified Fiscal Plan* (Dkt. No. 18292); and
- f. Any other responses or motions related to the foregoing.

4. AmeriNat reserves the right to be heard and present oral argument on any matter identified in the agenda to be filed by the Oversight Board in connection with the Omnibus Hearing, or to address any statement or issue that may be raised by any party at the Omnibus Hearing related to the Title III cases or adversary proceedings which may affect the interests of the DRA. AmeriNat also reserves the right to amend this motion as needed.

WHEREFORE, AmeriNat respectfully requests the Court to take note of the foregoing and deem it in compliance with the Scheduling Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of September, 2021.

CERTIFICATE OF SERVICE: In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court's *Fifteenth Amended Notice, Case Management and Administrative Procedures Order* (Dkt. No. 17127-1) (the "CMP Order"), we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

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